



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 12, 2020

Via ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Telephonic conference adjourned from November 17, 2020 to
January 18, 2021 at 10:30 a.m.

SO ORDERED.

Dated: 11/12/2020

P. Kevin Castel
United States District Judge

**Re: *United States v. Geovanny Fuentes Ramirez,*
S6 15 Cr. 379 (PKC)**

Dear Judge Castel:

The Government respectfully requests that the Court enter the enclosed protective order governing the handling of material to be produced by the Government pursuant to the Jencks Act and *Giglio*. Defense counsel has consented to the entry of this order on behalf of the defendant.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/

Amanda Houle
Matthew Laroche
Jason A. Richman
Elinor Tarlow
Assistant United States Attorneys
(212) 637-2194

Cc: Defense Counsel
(Via ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
:

UNITED STATES OF AMERICA

:

- v. -

S6 15 Cr. 379 (PKC)

:

GEOVANNY FUENTES RAMIREZ,

:

Defendant.

:

- - - - -X

Whereas the United States of America, Audrey Strauss, Acting United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Amanda Houle, Matthew Laroche, Jason Richman, and Elinor Tarlow, seeks an order restricting the dissemination of material produced pursuant to the Jencks Act and *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material") in connection with the trial in this matter ("Trial");

Whereas, based on: (i) information in the public filings to date related to the defendant Geovanny Fuentes Ramirez and other defendants in this case indicates that the 3500 Material will contain sensitive information regarding assistance to law enforcement by others in sensitive ongoing investigations in Honduras and elsewhere as well as actual and threatened acts of violence against victims whose identities are not presently public; and (ii) the consent of the defendant, by and through his

attorney Avraham Moskowitz, Esq., the Court finds that there is good cause for the requested relief;

IT IS HEREBY ORDERED that the defendant and his defense team -- including but not limited to Mr. Moskowitz, and any U.S.-based paralegals, investigators, and interpreters working for the defendant or Mr. Moskowitz -- shall not transport or transmit any of the 3500 Material outside of the United States;

IT IS FURTHER ORDERED that the defendant and his defense team shall not show or disseminate any of the 3500 Material to anyone other than the defendant and U.S.-based paralegals, investigators, and interpreters working for Mr. Moskowitz;

IT IS FURTHER ORDERED that the defendant shall not possess any of the 3500 Material, either before, during, or after the Trial, except when reviewing the 3500 Material in the presence of Mr. Moskowitz or U.S.-based paralegals, investigators, and interpreters working for Mr. Moskowitz;

IT IS FURTHER ORDERED that the defendant and his defense team shall return to the Government, or destroy, all of the 3500 Material at the close of the Trial or when any appeals have become final; and

IT IS FURTHER ORDERED that defense counsel may seek authorization of the Court, with notice to the Government, to provide certain specified materials to persons whose access to such materials is otherwise prohibited by this Order, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

SO ORDERED:

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HONORABLE P. KEVIN CASTEL
United States District Court
Southern District of New York

11/12/2020

Date